IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

La Unión del Pueblo Entero, et al.,	§		
	§		
Plaintiffs,	§		
	§		
V.	§		
	§	Case No. 5:21-cv-00844-XR	
STATE OF TEXAS, et al.,	§	[Lead Case]	
	§		
Defendants.	§		
·	§		
HARRIS COUNTY REPUBLICAN PARTY, et al.,	§		
	§		
Intervenor-Defendants.	§		

LUPE PLAINTIFFS' MOTION TO EXTEND DEADLINE TO FILE ADVISORY REGARDING MOTION TO COMPEL

LUPE Plaintiffs ("Plaintiffs") respectfully request a two-day extension of their deadline to file an advisory regarding their motion to compel the production of documents (Dkt. 630), such that they may file an advisory by July 19, 2023. Plaintiffs were unable to learn Defendants' position on the motion before filing.

Pursuant to the Court's order at the July 11, 2023 hearing, Plaintiffs' deadline to file an advisory regarding the motion to compel is July 17, 2023. *See* Transcript of Motion to Compel Proceedings at 37:16-38-7. Plaintiffs seek the extension of time in order to review and respond to the three amended and supplemental declarations filed by State Defendants on Friday, July 14, 2023 and properly inform the Court of the effect of those declarations on the present dispute. Plaintiffs do not seek an extension to delay these proceedings, and a short extension will not prejudice Defendants.

Accordingly, Plaintiffs respectfully request that their motion be granted, and that their deadline to file an advisory regarding motion to compel (Dkt. 630) be extended to July 19, 2023.

Dated: July 17, 2023

/s/ Nina Perales

Nina Perales (TX Bar No. 24005046) Julia R. Longoria (TX Bar No. 24070166) Fátima L. Menéndez (TX Bar No. 24090260) Kenneth Parreno (MA BBO No. 705747) MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND

110 Broadway, Suite 300 San Antonio, TX 78205 Telephone: (210) 224-5476 Facsimile: (210) 224-5382 nperales@maldef.org jlongoria@maldef.org fmenendez@maldef.org

kparreno@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, New York 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com

Attorneys for Plaintiffs

jason.kanterman@friedfrank.com

kevin.zhen@friedfrank.com

LA UNIÓN DEL PUEBLO ENTERO, SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT, MEXICAN AMERICAN BAR ASSOCIATION OF TEXAS, TEXAS HISPANICS Respectfully Submitted,

/s/ Sean Morales-Doyle

Sean Morales-Doyle (NY Bar No. 5646641) Patrick A. Berry (NY Bar No. 5723135) Jasleen K. Singh (CA. Bar No. 316596) Eliza Sweren-Becker (NY Bar No. 5424403) Andrew B. Garber (NY Bar No. 5684147) Leah J. Tulin (MD No. 0812180236) BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW 120 Broadway, Suite 1750 New York, NY 10271 Telephone: (646) 292-8310 Facsimile: (212) 463-7308 sean.morales-doyle@nyu.edu patrick.berry@nyu.edu jasleen.singh@nyu.edu eliza.sweren-becker@nyu.edu andrew.garber@nyu.edu

Paul R. Genender (TX Bar No. 00790758) Elizabeth Y. Ryan (TX Bar No. 24067758) Matthew Berde (TX Bar No. 24094379) Megan Cloud (TX Bar No. 24116207) WEIL, GOTSHAL & MANGES LLP 200 Crescent Court, Suite 300

Dallas, Texas 75201

Telephone: (214) 746-8158 Facsimile: (214)746-7777 paul.genender@weil.com liz.ryan@weil.com matt.berde@weil.com megan.cloud@weil.com

tulinl@brennan.law.nyu.edu

COUNSEL FOR FRIENDSHIP-WEST BAPTIST CHURCH, ANTI-DEFAMATION LEAGUE AUSTIN, SOUTHWEST, AND TEXOMA, TEXAS IMPACT, JAMES LEWIN ORGANIZED FOR POLITICAL EDUCATION, JOLT ACTION, WILLIAM C. VELASQUEZ INSTITUTE, FIEL HOUSTON INC

*Admitted pro hac vice

*Admitted pro hac vice

CERTIFICATE OF CONFERENCE

I hereby certify that, at 3:21pm on July 17, 2023, counsel for LUPE Plaintiffs emailed counsel for State Defendants regarding the instant motion. Counsel for State Defendants did not respond prior to the filing of this motion.

/s/ Nina Perales
Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 17th day of July 2023.

/s/ Nina Perales
Nina Perales